

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

JOINT MOTION REGARDING CONTINUED SEALING

Documents have been filed under temporary seal in connection with the following motion:

	MDL Docket	18-296 Docket
Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas	No. 766	No. 280

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
768 (282 in 18-296 Docket)	769 (283 in 18-296 Docket)	Defendants' Memorandum of Law in Support of Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas	<p><i>Defendants' position:</i> Redacted portions of document should remain sealed.</p> <p><i>Plaintiffs' position:</i> Plaintiffs do not oppose redacted portions of document remaining sealed.</p>	<p><i>Defendants' position:</i> Contains information designated as Confidential under a protective order issued in this case [MDL Dkt. No. 464].</p>
771 (285 in 18-296 Docket)		Certain Exhibits to the Declaration of Sarah M. Lightdale in Support of	<p><i>Defendants' position:</i> Exhibit 15 should remain sealed.</p> <p>Defendants do not</p>	<p><i>Defendants' position:</i> Exhibit 15 contains information designated as Confidential under</p>

		<p>Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas ("Lightdale Declaration"):</p> <p>Exhibit 12 – Defendants' Responses and Objections to Plaintiffs' First Set of Requests for Production, dated October 4, 2019</p> <p>Exhibit 13 – Email dated January 27, 2020 from B. Koch to J. Tebor <i>et al.</i></p> <p>Exhibit 14 – Email dated December 18, 2019 from J. Tebor to B. Koch</p> <p>Exhibit 15 – Document produced</p>	<p>oppose unsealing Exhibits 12, 13, 14, and 18.</p> <p><i>Plaintiffs' position:</i> Plaintiffs do not oppose Exhibit 15 remaining sealed. Exhibits 12, 13, 14, and 18 should be unsealed.</p>	<p>a protective order issued in this case [MDL Dkt. No. 464].</p> <p><i>Plaintiffs' position:</i> Exhibit 15 contains identifying information regarding a CenturyLink customer. Exhibits 12, 13, 14, and 18 do not contain trade secrets or other confidential or proprietary information.</p>
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		<p>with the Bates number CTLMNSEC0084614 1</p> <p>Exhibit 18 – Plaintiffs' First Requests for Production, dated September 4, 2019</p>		
777 (292 in 18-296 Docket)	778 (293 in 18-296 Docket)	Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas	<p>Defendants' position: Redacted portions of document should remain sealed.</p> <p>Plaintiffs' position: Plaintiffs do not oppose redacted portions of document remaining sealed.</p>	<p>Defendants' position: Contains information designated as Confidential and/or Highly Confidential – Attorney's Eyes Only under a protective order issued in this case [MDL Dkt. No. 464].</p>
779 (294 in 18-296 Docket)	780 (295 in 18-296 Docket)	Declaration of Michael D. Blatchley in Support of Plaintiffs' Opposition to Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas	<p>Defendants' position: Redacted portions of document should remain sealed.</p> <p>Plaintiffs' position: Plaintiffs do not oppose redacted</p>	<p>Defendants' position: Contains information designated as Confidential and/or Highly Confidential – Attorney's Eyes Only under a protective order issued in this</p>

		(“Blatchley Declaration”)	portions of document remaining sealed.	case [MDL Dkt. No. 464].
779-1 779-2 779-3 779-4 779-5 779-6 (In 18-296 docket:294-1 294-2 294-3 294-4 294-5 294-6)		<p>Certain Exhibits to the Declaration of Michael D. Blatchley in Support of Plaintiffs' Opposition to Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas:</p> <p>Exhibit A – Document produced with the Bates number CTLMNSEC0025134 4</p> <p>Exhibit B – Document produced with the Bates number CTLMNSEC0037427 8 and excerpts of attached documents</p>	<p>Defendants' position: Documents should remain sealed.</p> <p>Plaintiffs' position: Plaintiffs do not oppose documents remaining sealed.</p>	<p>Defendants' position: Contains information designated as Confidential and/or Highly Confidential – Attorney's Eyes Only under a protective order issued in this case [MDL Dkt. No. 464].</p>

		<p>Exhibit C – Document produced with the Bates number CTLMNSEC0130238 8</p> <p>Exhibit D – Document produced with the Bates number CTLMNSEC0025990 8</p> <p>Exhibit E – Document produced with the Bates number CTLMNSEC0013274 2</p> <p>Exhibit J – Document produced with the Bates number CTLMNSEC0035343 5 and excerpts of attached documents</p>		
785 (300 in 18-296 Docket)		Exhibit A to Letter from Patrick Gibbs to The Honorable Katherine M.	<i>Defendants' position:</i> Defendants do not oppose unsealing this document.	<i>Plaintiffs' position:</i> Does not contain trade secrets or other confidential or

		Menendez requesting reply brief: July 31, 2020 email from Christopher Andrews to Richard Gluck <i>et al.</i>	<i>Plaintiffs' position:</i> Document should be unsealed.	proprietary information.
792 (304 in 18-296 Docket)	793 (305 in 18-296 Docket)	Defendants' Reply Memorandum of Law in Support of Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas	<i>Defendants' position:</i> Redacted portions of document should remain sealed. <i>Plaintiffs' position:</i> Plaintiffs do not oppose redacted portions of document remaining sealed.	<i>Defendants' position:</i> Contains information designated as Confidential and/or Highly Confidential – Attorney's Eyes Only under a protective order issued in this case [MDL Dkt. No. 464].
794 (306 in 18-296 Docket)	795 (307 in 18-296 Docket)	Declaration of Sarah M. Lightdale in Support of Defendants' Reply Memorandum in Support of Defendants' Motion for Protective Order Regarding Plaintiffs' Third-Party Subpoenas ("Lightdale Reply Declaration")	<i>Defendants' position:</i> Redacted portions of document should remain sealed. <i>Plaintiffs' position:</i> Plaintiffs do not oppose redacted portions of document remaining sealed.	<i>Defendants' position:</i> Contains information designated as Confidential and/or Highly Confidential – Attorney's Eyes Only under a protective order issued in this case [MDL Dkt. No. 464].

DATED this 11th day of September, 2020.

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